

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 *Attorney for Plaintiff Jose A. Iraheta Hernandez*

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Jose A. Iraheta Hernandez,
14
15 Plaintiff,
16 v.
17 Backgroundchecks.com, LLC,
18
19 Defendant.

Case No.: 2:20-cv-01766-GMN-BNW

**Stipulation for an extension of time
for Response and Reply to
Defendant's motion to dismiss
(First request)**

20 Jose A. Iraheta Hernandez ("Plaintiff") and Backgroundchecks.com
21 LLC, ("Defendant" and together with Plaintiff as the "parties"), by and
22 through their respective counsel, hereby submit this stipulation to extend the
23 deadlines for filing a response and reply to Defendant's motion to dismiss,
24 filed on January 11, 2021 (ECF No. 24). This is the first request for an
25 extension of these deadlines.

26 The extension is sought to accommodate the workload and schedule of
27 counsel, is sought in good faith, and is not made for the purposes of delay.

1 The parties therefore stipulate that Plaintiff's opposition to the pending
2 motion shall be due on or before **February 1, 2021**. If this extension is
3 approved by the Court, Defendant's reply would then be due on or before
4 February 8, 2021. See Local Rule 7-2(b).

5 The parties further stipulate that Defendant shall also have a one-week
6 extension to file its reply, up to and including **February 15, 2021**. The parties
7 agree that good cause exists for the extensions.

8 Dated: January 25, 2021.

9 **KIND LAW**


10 /s/ Michael Kind
11 Michael Kind, Esq.
12 8860 South Maryland Parkway, Suite 106
13 Las Vegas, Nevada 89123
14 *Attorney for Plaintiff Jose A. Iraheta Hernandez*

15 **LITTLER MENDELSON, P.C.**

16 /s/ Diana Dickinson
17 Diana Dickinson, Esq.
18 William J. Simmons, Esq.
19 3960 Howard Hughes Parkway, Suite 300
20 Las Vegas, Nevada 89169
21 *Attorneys for Defendant Backgroundchecks.com, LLC*

22 **IT IS SO ORDERED.**

23 Dated this 25 day of January, 2021.

24 
25 _____
26 Gloria M. Navarro, District Judge
27 UNITED STATES DISTRICT COURT